

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

THE TRANSPARENCY PROJECT,

Plaintiff,

v.

U.S. DEPARTMENT OF JUSTICE, et al.,

Defendants.

CIVIL ACTION No. 4:20CV467

JUDGE SEAN D. JORDAN

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**NON-FBI DEFENDANTS’ OPPOSITION TO  
PLAINTIFF’S “CROSS-MOTION FOR SUMMARY JUDGMENT”**

Defendants the United States Department of Justice (“DOJ”)<sup>1</sup>, the National Security Agency (“NSA”), the Central Intelligence Agency (“CIA”), and the Office of the Director of National Intelligence (“ODNI”), file this opposition to Plaintiff’s “Cross-Motion for Summary Judgment.” [ECF 59].<sup>2</sup> While Plaintiff’s filing purports to be a “Cross-Motion for Summary Judgment,” he does not actually move for summary judgment but rather just provides conclusory arguments in response to the arguments

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<sup>1</sup> The DOJ components in this case include the National Security Division (“NSD”); the Criminal Division (“CRM”); the Executive Office of United States Attorneys (“EOUSA”); and the Office of Information Policy (“OIP”) on behalf of the Offices of the Attorney General (“OAG”) and the Office of Legislative Affairs (“OLA”).

<sup>2</sup> The Non-FBI Defendants do not want to burden the Court with a reply to Plaintiff’s Opposition to the Non-FBI Defendants’ Motion for Summary Judgment when one is not necessary here, as Plaintiff’s opposition is admittedly poorly briefed and conclusory. However, the Non-FBI Defendants would be happy to address particular issues if further briefing is requested by the Court.

raised in Non-FBI Defendants' Motion for Summary Judgment. Therefore, the Court should summarily deny Plaintiff's "cross-motion" and grant Non-FBI Defendants' Motion for Summary Judgment for all the reasons set forth in their motion. [ECF 51].

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 2, 2022, a true and correct copy of the foregoing document was filed electronically with the court and has been sent to counsel of record via the court's electronic filing system.

/s/ *Andrea L. Parker*  
ANDREA L. PARKER  
Assistant United States Attorney